

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
2 A Limited Liability Partnership  
3 Including Professional Corporations  
4 NEIL A.F. POPOVIĆ, Cal. Bar No. 132403  
5 ANNA S. MCLEAN, Cal. Bar No. 142233  
6 TENAYA RODEWALD, Cal. Bar No. 248563  
7 LIÊN H. PAYNE, Cal. Bar No. 291569  
8 JOY O. SIU, Cal. Bar No. 307610  
9 Four Embarcadero Center, 17<sup>th</sup> Floor  
San Francisco, California 94111-4109  
Telephone: 415.434.9100  
Facsimile: 415.434.3947  
Email: npopovic@sheppardmullin.com  
amclean@sheppardmullin.com  
rodewald@sheppardmullin.com  
lpayne@sheppardmullin.com  
jsiu@sheppardmullin.com

10 Attorneys for Defendant,  
11 SEAGATE TECHNOLOGY LLC

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14  
15 IN RE SEAGATE TECHNOLOGY LLC  
16 LITIGATION

17 CONSOLIDATED ACTION

Case No. 3:16-cv-00523-JCS

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
**DECLARATION OF JOY O. SIU IN  
SUPPORT OF ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF SEAGATE'S  
OPPOSITION TO MOTION FOR CLASS  
CERTIFICATION**

**Date:** March 30, 2018  
**Time:** 9:30 a.m.  
**Place:** Courtroom G  
**Judge:** Hon. Joseph C. Spero

Second Consolidated Amended Complaint  
filed: July 11, 2016

**DECLARATION OF JOY O. SIU**

I, Joy O. Siu, declare:

1. I am an associate with Sheppard Mullin Richter & Hampton, LLP, counsel of record for Seagate Technology LLC (“Seagate”). I submit this Declaration in support of the Administrative Motion to File Under Seal pursuant to Civil Local Rules 7-11 and 79-5. I have personal knowledge of the facts set forth in this declaration, except where noted otherwise, and, if called as a witness, could and would competently testify to these statements.

2. Plaintiffs filed their Motion for Class Certification on November 8, 2017, with various supporting documents, including the Declaration of Andrew Hospodor (“Hospodor Declaration”). Dkt. 133. After Seagate advised Plaintiffs that their filing omitted various exhibits and appendices, on November 20, 2017, Plaintiffs filed, among other documents, a Notice of Errata attaching a new version of the Declaration of Andrew Hospodor. Dkt. 146, Ex. B.

3. Pursuant to Local Rule 79-5(e), Seagate filed the Declaration of Ronald Lane in support of the Administrative Motion to File Under Seal (“Lane Declaration”), Dkt. 143, and Declaration of Anna S. McLean in Support of Administrative Motion to File Under Seal, Dkt. 149, seeking an order sealing portions of the Hospodor Declaration (i.e. the last two sentences of ¶ 2, ¶ 17, and ¶¶ 23-212, and corresponding figures and footnotes).

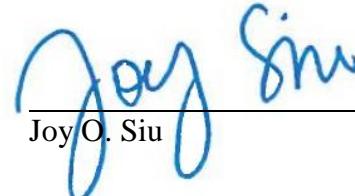
4. As set forth in the Lane Declaration, Dkt.143 ¶ 3, the Hospodor Declaration quotes and incorporates Seagate’s confidential and trade secret information. Therefore, the information contained in the Hospodor Declaration is subject to protection under Local Rule 79-5.

5. To rebut the contentions in the Hospodor Declaration, and in support of its Opposition to Plaintiffs' Motion for Class Certification, Seagate now files the Declarations of Don Adams, Glen Almgren, Patrick Dewey, Harrie Netel, and Itamar Simonson, Ph.D., and various exhibits to the Declaration of Lin H. Payne, all of which reference the same confidential information, or a portion thereof, cited in the Hospodor Declaration.

6. Because they reference the same confidential information as the Hospodor Declaration, Seagate seeks a further order sealing portions of the above documents.

1 I declare under the penalty of perjury under the laws of the United States that the above  
2 statements are true.

3 Executed this 5th day of January, 2018 in San Francisco, California.

4  
5  
6   
7

Joy O. Siu

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28